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Summary of Benefits and Coverage and Uniform Glossary

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Summary of Benefits and Coverage and Uniform Glossary: Templates, Instructions, and Related

Materials under Public Health Service Act

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## **General Comment**

I am a Faculty Scholar in the Herschel S. Horowitz Center for Health Literacy at the University of Maryland College Park School of Public Health. I am a career consumer educator. I examined the proposed template and glossary and read the report of the consumer study conducted by Consumers Reports. I concur that both are needed. Still, they seem to be information-dense and to assume a fairly high level of consumer health insurance literacy specifically and health and financial literacy in general.

My concern is that they may exceed the capacity of most consumers to actually understand and be able to make sound decisions that result in a good match between their life situations and the kind of insurance purchased. I think that further testing with a wide range of consumers from across the country is needed before accepting the proposed template and glossary. Further, I think that experts in conversion of government documents into plain language should be consulted. Both the Affordable Care Act and the Plain Language Writing Act call for clarity in language.

In my opinion, these documents are still written from the perspective of the professionals and not from the diversity of consumers who will use, or attempt to use, them to make decisions.